

Exhibit 1

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TENNESSEE
AT GREENEVILLE

B.P., et al.,)	
)	Case No. 2:23-cv-71
Plaintiffs,)	
)	Judge Travis R. McDonough
v.)	
)	Magistrate Judge Jill E. McCook
JOHNSON CITY, TENNESSEE, et al.,)	
)	
Defendants.)	

PROTECTIVE ORDER REGARDING UNNAMED CLASS MEMBER DEPOSITIONS

Upon review of Plaintiffs' Motion for Protective Order Regarding Depositions of Unnamed Class Members and/or Motion to Quash Deposition Subpoenas Issued to Females 8, 9, and 12, and finding good cause, the Court hereby enters the following Protective Order to govern the depositions of any unnamed class members:

1. Defendants Must First Obtain Leave of Court. Defendants must seek and obtain leave of court prior to seeking to conduct the deposition of any unnamed putative class member in this case. In seeking leave, Defendants must comply with Sixth Circuit jurisprudence and demonstrate that the deposition is appropriate and warranted under the circumstances; the testimony sought is directly relevant to common questions and is unavailable from the representative parties; the deposition will not unduly harass or burden the unnamed class member; and

//

//

2. Restrictions on Depositions that are Allowed to Proceed.

Any deposition of an absent class member will be subject to the following parameters

(unless counsel agrees otherwise):

- a) The deposition shall be limited to 1.5 hours of defense counsel examination, and .5 hours of redirect.
- b) Defendants will designate one attorney to examine the witness. No other attorneys for Defendants will examine the witness.
- c) Defendants and their employees will watch the deposition remotely.
- d) The witness will have the option to have a support person present.
- e) Questions regarding the following topics will not be permitted:
 - (i) The witness's sexual conduct or any sexual assaults (if applicable)
 - (ii) Drug or alcohol use (if applicable)
 - (iii) Child custody (if applicable)
 - (iv) Domestic abuse or restraining orders (if applicable)
 - (v) Mental health issues, diagnoses, and treatment thereof (if applicable)

3. Continuing Jurisdiction. To the extent authorized by law, the Court shall retain continuing jurisdiction over this Protective Order and may modify it as justice requires.

IT IS SO ORDERED.

THE HONORABLE JILL E. MCCOOK
UNITED STATES MAGISTRATE JUDGE